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June 3, 2022

VIA ECF

Hon. Judge Stewart D. Aaron
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Room 1970
New York, NY 10007

Re: *Carlos Alvarez Chicas et al. v. Kelco Construction, Inc. et al.*
Case No.: 1:21-cv-09014 (PAE) (SDA)

Dear Judge Aaron:

We represent Defendants Kelco Construction, Inc., E.L.M. General Construction Corp., John Kelly, and Joseph Provenzano (“Defendants”) in the above-referenced matter. In accordance with Your Honor’s Individual Practices, Defendants submit their letter motion to request an extension of time to respond to Plaintiff’s motion seeking leave to amend the Complaint, filed on May 9, 2022 (Dkt. 35). Defendants’ response is currently due Monday, June 6th. Defendants respectfully request a seven (7) day extension of time, up to and including June 13, 2022, to prepare its response. Plaintiff’s counsel has consented to the request. The reason for the request is that the parties are currently engaged in discussions concerning the proposed amendments (and potentially further amendments), collective action certification, and potential mediation. We thank the Court for its time and consideration.

Respectfully submitted,

/s/Eli Freedberg

Eli Freedberg

Cc: All Counsel of Record (via ECF)